## **REMARKS**

The Office Action dated December 26, 2007 has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto.

Claims 1-19 are pending and under consideration.

## REJECTION UNDER 35 U.S.C. § 102:

In the Office Action, at page 2, claims 1-19 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,560,229 to Kadambi ("Kadambi"). The Office Action took the position that Kadambi discloses all the aspects of independent claims 1, 8, and 14. The rejection is traversed and reconsideration is requested.

Independent claim 1, upon which claims 2-7 are dependent, recites a method of handling datagrams in a network device coupled to other network devices. The method includes receiving an incoming datagram at a port of the network device and determining an egress port for the incoming datagram based on a destination address contained in the incoming datagram and a lookup of an address resolution lookup (ARL) table. The method also includes performing a lookup of the ARL table based on a source address contained in the incoming datagram to determine whether the source address has been learned previously, and writing an entry into the ARL table when the source address has not been learned previously. The method further includes determining whether the other network devices have learned the source address when the source address has been

learned previously, and continuing to relay a learning message with the source address to the other network devices when it is determined that the other network devices have not learned the source address.

Independent claim 8, upon which claims 9-13 are dependent, recites a network device coupled to other network devices for handling datagrams. The network device includes a plurality of ports for receiving an incoming datagram, an address resolution lookup (ARL) table, and means for determining an egress port for the incoming datagram based on a destination address contained in the incoming datagram. The network device includes lookup means for performing a lookup of the ARL table based on a source address contained in the incoming datagram to determine whether the source address has been learned previously, and writing means for writing an entry into the ARL table when the source address has not been learned previously. The network device also includes determining means for determining whether the other network devices have learned the source address when the source address has been learned previously, and relaying means for relaying a learning message with the source address to the other network devices when it is determined that the other network devices have not learned the source address.

Independent claim 14, upon which claims 15-19 are dependent, recites a network device coupled to other network devices for handling datagrams. The network device include a plurality of ports for receiving an incoming datagram, an address resolution lookup (ARL) table, and an egress port determiner for determining an egress port for the incoming datagram based on a destination address contained in the incoming datagram. The network device includes an ARL table reader for performing a lookup of the ARL

table based on a source address contained in the incoming datagram to determine whether the source address has been learned previously, and an ARL table writer for writing an entry into the ARL table when the source address has not been learned previously. The network device also includes a global address determiner for determining whether the other network devices have learned the source address when the source address has been learned previously, and a learning message forwarder for relaying a learning message with the source address to the other network devices when it is determined that the other network devices have not learned the source address.

As will be discussed below, Kadambi fails to disclose or suggest the elements of any of the presently pending claims.

Kadambi generally describes a method of switching data in a network switch. See column 3, lines 1-30. The method comprises the steps of receiving an incoming packet at a first port, then reading a first packet portion, less than a full packet length, to determine particular packet information. The particular packet information includes a source address and a destination address. The particular packet information is compared to information contained in a lookup table. If a match is made, the packet is modified to include appropriate forwarding and routing information based on the matching entry. The packet is then sent on a communication channel to a selected memory buffer.

However, Kadambi fails to teach or suggest, at least, "determining whether the other network devices have learned the source address when the source address has been learned previously; and continuing to relay a learning message with the source address to the other network devices when it is determined that the other network devices have not

learned the source address," as recited in independent claim 1. Rather, in Kadambi, if there is no match between a particular packet information and information contained in a lookup table, the particular packet information is learned and placed as a second entry in the lookup table. The packet information is modified to indicate that the packet is to be sent to all ports on the network switch. (Emphasis added) However, Kadambi does not make a determination of whether other network devices have learned the source address. Instead, the packet is sent to all ports on the network switch. Also, Kadambi does not teach or suggest that when it is determined that the other network devices have not learned the source address, a learning message with the source address is relayed to the other network devices. Rather, Kadambi describes that the packet is sent to the selected memory buffer and is then retrieved from the selected memory buffer, and sent to appropriate destination ports as indicated in the modified packet information.

For similar reasons as those presented above to support the patentability of independent claim 1, Kadambi fails to teach or suggest, at least, "determining means for determining whether the other network devices have learned the source address when the source address has been learned previously; and relaying means for relaying a learning message with the source address to the other network devices when it is determined that the other network devices have not learned the source address," as recited in independent claim 8 and, at least, "a global address determiner for determining whether the other network devices have learned the source address when the source address has been learned previously; and a learning message forwarder for relaying a learning message

with the source address to the other network devices when it is determined that the other network devices have not learned the source address," as recited in independent claim 14.

Because Kadambi must teach all of the elements of the base claim and any intervening claims of dependent claims 2-7, 9-13, and 15-19, the arguments presented above supporting the patentability of independent claims 1, 8, and 14 over Kadambi are incorporated herein to support the patentability of the dependent claims. Therefore, it is respectfully requested that independent claims 1, 8, and 14 and related dependent claims be allowed.

## **CONCLUSION:**

In view of the above, Applicant respectfully submits that the claimed invention recites subject matter which is neither disclosed nor suggested in the cited prior art. Applicant further submits that the subject matter is more than sufficient to render the claimed invention unobvious to a person of skill in the art. Applicant therefore respectfully requests that each of claims 10-29 be found allowable and this application passed to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the Applicant's undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the Applicant respectfully petitions for an appropriate extension of time.

Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,

Registration No. 46,621

Customer No. 32294 SQUIRE, SANDERS & DEMPSEY LLP 14<sup>TH</sup> Floor 8000 Towers Crescent Drive Tysons Corner, Virginia 22182-2700 Telephone: 703-720-7800

Fax: 703-720-7802

AMC:dc